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Attorneys for Defendant Robert Ladd

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	Case No. 1:18-cv-08175-ER
)	
v.)	
)	
BARRY C. HONIG,)	ORAL ARGUMENT REQUESTED
<i>et al.</i> ,)	
)	
Defendants.)	
)	

**NOTICE OF DEFENDANT ROBERT LADD'S MOTION TO COMPEL
A RULE 30(B)(6) DEPOSITION OF THE SEC**

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, pursuant to Federal Rule of Civil Procedure 37(a)(3)(B)(ii), Defendant Robert Ladd by and through counsel will move this Court for an order compelling a Rule 30(b)(6) deposition of Plaintiff Securities and Exchange Commission.

PLEASE TAKE FURTHER NOTICE that Mr. Ladd will rely on the accompanying Memorandum of Law in Support of Defendant Robert Ladd's Motion to Compel a Rule 30(b)(6) Deposition of the SEC, the declaration of Randall Lee, and the exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that Mr. Ladd requests oral argument.

Dated: May 4, 2020

Respectfully submitted,

/s/ Randall R. Lee
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